

# EXHIBIT G

**From:** [Cotton, Chris \(SHB\)](#)  
**To:** [Sarah London](#); [Rachel B. Adams](#); [Roopal P. Luhana](#); [Walter E. Cubberly](#); [Steve S. Schulte](#); [Andrew Kaufman](#)  
**Cc:** [Premo-Hopkins, Mark W.](#)  
**Subject:** RE: Uber MDL: Request for Meet and Confer this Week re Local Rule 3-15 Status Report Deficiencies  
**Date:** Tuesday, August 26, 2025 6:55:29 PM  
**Attachments:** [Draft certification.docx](#)

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Sarah,

I'm following up on our meet and confer yesterday regarding Plaintiffs' Local Rule 3-15 Status Report Deficiencies. During our discussion, you suggested that Uber propose language for a template certification for plaintiffs' counsel to complete. I agreed to consider your proposal and get back to you.

Attached is proposed language for a certification. The language is aimed at addressing (1) Judge Cisneros's recent orders (ECF Nos. 3625 & 3676), and (2) the questions you raised during our call yesterday about the areas of interest that would be relevant and subject to disclosure.

Please let me know if this template is agreeable to plaintiffs or if you have any comments by this Thursday, April 28. Happy to discuss further if you'd like.

Thanks.

Chris

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**From:** Cotton, Chris (SHB) <CCOTTON@shb.com>  
**Sent:** Monday, August 25, 2025 10:53 AM  
**To:** Sarah London <slondon@girardsharp.com>; Rachel B. Adams <rabrums@peifferwolf.com>; Roopal P. Luhana <luhana@chaffinluhana.com>; Walter E. Cubberly <wcubberly@whlaw.com>; Steve S. Schulte <schulte@ntrial.com>  
**Cc:** Mark Premo-Hopkins <mark.premohopkins@kirkland.com>  
**Subject:** RE: Uber MDL: Request for Meet and Confer this Week re Local Rule 3-15 Status Report Deficiencies

No problem, Sarah. I have some other meetings coming up. I'll reset this for 3:00 Pacific today. Let me know if you'd prefer a different time.

Talk to you soon.

Chris

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**From:** Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>  
**Sent:** Monday, August 25, 2025 10:43 AM  
**To:** Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>; Rachel B. Adams <[rabrums@peifferwolf.com](mailto:rabrums@peifferwolf.com)>; Roopal P. Luhana <[luhana@chaffinluhana.com](mailto:luhana@chaffinluhana.com)>; Walter E. Cubberly <[wcubberly@whlaw.com](mailto:wcubberly@whlaw.com)>;

Steve S. Schulte <[schulte@ntrial.com](mailto:schulte@ntrial.com)>

**Cc:** Mark Premo-Hopkins <[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)>

**Subject:** Re: Uber MDL: Request for Meet and Confer this Week re Local Rule 3-15 Status Report Deficiencies

## EXTERNAL

Good morning—I am a bit delayed this morning. Can we convene later today? I should free up by 9:30.

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**From:** Cotton, Chris (SHB) <[CCOTTON@shb.com](mailto:CCOTTON@shb.com)>

**Sent:** Tuesday, August 19, 2025 1:49:41 PM

**To:** Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Rachel B. Adams <[rabrums@peifferwolf.com](mailto:rabrums@peifferwolf.com)>;  
Roopal P. Luhana <[luhana@chaffinluhana.com](mailto:luhana@chaffinluhana.com)>; Walter E. Cubberly <[wcubberly@whlaw.com](mailto:wcubberly@whlaw.com)>;  
Steve S. Schulte <[schulte@ntrial.com](mailto:schulte@ntrial.com)>

**Cc:** Mark Premo-Hopkins <[mark.premohopkins@kirkland.com](mailto:mark.premohopkins@kirkland.com)>

**Subject:** Uber MDL: Request for Meet and Confer this Week re Local Rule 3-15 Status Report Deficiencies

## EXTERNAL EMAIL

Counsel,

Following up on the attached letter, please let me know your availability this Thursday or Friday to meet and confer regarding Plaintiffs' Local Rule 3-15 Status Report Deficiencies.

Thanks.

Chris

**Christopher V. Cotton**

*Partner*

Shook, Hardy & Bacon L.L.P.

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1. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any company or entity that is financing any lawsuits involving claims against Uber that are at issue in this MDL? (Yes/No). Please describe your investigation. If you answered “Yes”, identify those entities.

RESPONSE:

2. Do you, your firm, any firm partner or employee, or any co-counsel have any financial relationship (direct or indirect) with any bank, private equity fund, hedge fund, settlement administrator, vendor, or similar institution (except for holdings in mutual funds that do not grant control over such entities) that has a role in any lawsuits involving claims against Uber that are at issue in this MDL? (Yes/No). Please describe your investigation. If you answered “Yes,” identify those entities.

RESPONSE:

3. Does your firm have any non-lawyer ownership interests in it that stand to benefit from any claims against Uber in the MDL? (Yes/No). If “Yes”, identify those entities.

RESPONSE:

4. Do you, your firm, or any co-counsel have any financing that is contingent upon the outcome of any lawsuits involving claims against Uber that are at issue in this MDL? (Yes/No). Please describe your investigation. If you answered “Yes,” identify those entities and answer the following questions:

- a. Does the litigation funder have any control (direct or indirect, actual or apparent or implied) over the decision to file or the content of any motions or briefs, or any input into the decision to accept a settlement offer?

- b. Does the financing (1) create any conflict of interest for counsel, (2) undermine counsel's obligation of vigorous advocacy, (3) affect counsel's independent judgment, (4) give to the lender any control over litigation strategy or settlement decisions (as to either the common benefit work done by counsel or work for individual retained clients), or (5) affect party control of settlement?
- c. Briefly explain the nature of the financing, the amount of the financing, and submit a copy of the documentation to the Court, or if applicable, to the Special Master.

RESPONSE:

- 5. Provide a digest of all interested entities (and the cases in which they have an interest) in the MDL docket, including but not limited to any entities identified above.

RESPONSE: